

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

**JENNIFER LEE KAUFMAN and
DAMIEN W. KAUFMAN, Individually and as
ADMINISTRATORS OF THE ESTATES
OF ABIGAIL KAUFMAN, a minor, deceased
and BRIANNA BAER, a minor, deceased**
630 Linden Avenue
Hellertown, PA 18055

Plaintiffs,

v.

JETSON ELECTRIC BIKES, LLC
86 34th Street, Fourth Floor
Brooklyn, NY, 11232

and

TARGET CORPORATION
1000 Nicollet Mall
Minneapolis, MN 55403

Defendants.

CIVIL ACTION NO:

5:22-cv-03765-JFL

JURY TRIAL DEMANDED

CIVIL ACTION - FIRST AMENDED COMPLAINT

Plaintiffs, Jennifer Lee Kaufman and Damien W. Kaufman, in their individual capacity and as Co-Administrators of the Estates of Abigail Kaufman, a deceased minor and Brianna Baer, a deceased minor, by and through their undersigned counsel, Kline & Specter, PC, hereby bring this action against Defendants, Jetson Electric Bikes, LLC and Target Corporation and in support thereof aver as follows:

PARTIES, JURISDICTION AND VENUE

1. Plaintiff, Jennifer Lee Kaufman, is an adult person and resident of the state of Pennsylvania residing at 630 Linden Avenue, Hellertown, Pennsylvania 18055.

25. Despite knowing that the design and makeup of the Jetson Rogue Hoverboards caused, and increased the risk of causing, permanent and catastrophic injuries and death, the Defendants continued to market, sell, advertise and tout the Jetson Rogue Hoverboard as a safe product.

26. Despite knowing that the design and makeup of the Jetson Rogue Hoverboard caused, and increased the risk of causing, permanent and catastrophic injuries and death, the Defendants knowingly, purposely, and consciously concealed their knowledge of these serious dangers associated with the Jetson Rogue Hoverboard.

27. On or about December 9, 2018, Plaintiff, Damien Kaufman, purchased the Jetson Rogue Hoverboard at Target (authorized dealer of the Jetson Rogue Hoverboard) located on 610 North West End Boulevard, Quakertown, Pennsylvania 18951 as a Christmas gift for Plaintiff minor-decedent, Brianna Baer.

28. The Jetson Rogue Hoverboard, and/or its component parts, were designed and/or manufactured by Defendants.

29. On or about April 1, 2022, Plaintiff minor-decedent, Abigail Kaufman began charging the Jetson Rogue Hoverboard inside her first floor bedroom.

30. While charging, the Jetson Rogue Hoverboard ignited causing the home to be engulfed with flames and smoke.

31. Plaintiff, Jennifer Kaufman, was able to escape the home from her first floor bedroom.

32. Plaintiff, Damien Kaufman, was inside the home's garage at the time of the fire, but was unable to enter the home due to the intensity of the fire.